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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ARMELIA LUCIANA BAXTRON,  
Plaintiff,  
v.  
KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,  
Defendant.

Case No.: 2:23-cv-01699-JCM-NJK

**STIPULATION TO VOLUNTARY  
REMAND PURSUANT TO SENTENCE  
FOUR OF 42 U.S.C. § 405(g) AND TO  
ENTRY OF JUDGMENT FOR  
PLAINTIFF**

The parties, through their respective counsel, hereby stipulate and agree that the above-captioned case be reversed and remanded to the Commissioner of Social Security for a new hearing before an Administrative Law Judge (ALJ) and a new decision in regard to Plaintiff's applications for disability benefits. On remand, the ALJ will take any necessary action to complete the administrative record, offer Plaintiff a new hearing, and continue through the sequential evaluation process, to include obtaining vocational evidence, as necessary, and issue a new decision.

1       The parties stipulate that this remand be made pursuant to sentence four of 42 U.S.C. § 405(g),  
2 and that Plaintiff may be entitled to reasonable attorney fees and costs pursuant to the Equal Access to  
3 Justice Act, 28 U.S.C. § 2412(d), upon proper request to this Court.

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1 The parties further request that the Clerk of the Court be directed to enter a final judgment in favor  
2 of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

3 DATED this 8th day of December 2023.

4 Respectfully submitted,

5 JASON M. FRIERSON  
6 United States Attorney

7 MATHEW W. PILE  
8 Associate General Counsel  
9 Office of Program Litigation, Office 7  
10 Social Security Administration

11 s/ Franco L. Becia

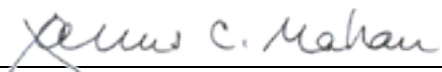
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22 DATED this 8th day of December 2023.

23 s/ Franco L. Becia For

24 HAL TAYLOR and HANNALORE MERRITT  
25 Attorneys for Plaintiff  
26 (PER EMAIL AUTHORIZATION)

IT IS SO ORDERED:

23   
24 UNITED STATES DISTRICT JUDGE

25 DATED: December 18, 2023 \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing to:

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I declare under penalty of perjury that the foregoing is true and correct.

DATED this 8th day of December 2023

/s/ Franco L. Becia

Franco L. Becia

Special Assistant United States Attorney